



County of San Diego

DEPARTMENT OF PUBLIC WORKS

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DIRECTOR

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June 17, 2004

City of Santee
Douglas Williford, ACIP
Director of Development Services
10601 Magnolia Avenue
Santee, CA 92071

Dear Mr. Williford:

GILLESPIE FIELD – AIRPORT LAYOUT PLAN DRAFT FINAL NARRATIVE REPORT

This letter is written in response to your June 1, 2004 correspondence regarding the ALP Narrative. Issues you have raised are noted below in bold and are followed by Airports response.

"This Letter will serve as City of Santee's response to the Gillespie Field Airport Layout Plan (ALP) Draft Final Narrative Report, dated March 2004. The ALP identifies specific areas for existing and future development to meet aviation demand, and encompasses 757 acres, mostly contained in the City of El Cajon. Gillespie Field is classified as a "Regional Business/Corporate Airport" in the California Aviation System Plan. Three demand forecasts were analyzed: a baseline, a high growth and low growth.

While the ALP is represented as a planning document, it clearly describes improvements that have a direct bearing on the expansion of noise contours over the City of Santee. Any expansion of CNEL contours that increases noise impacts to Santee is of great concern.

The ALP utilizes the high growth forecast in planning for improvements through 2025, and is reflected in preferred development Concept 5. The key "landside" elements of this Concept include the redevelopment of the 70-acre El Cajon Speedway to provide hangars, new terminal, tie-down areas and a six-acre area for helicopter use. Also proposed is the release of 12.6 acres west of Marshall Avenue for non-aviation uses. The key "airside" elements include the extension

Douglas Williford

Page 2

June 17, 2004

of Runway QR-27 L by 423 feet, a shortening of the runway displacement threshold for QL – 27 R through removal of airspace obstructions, and surface rehabilitation of all runways.

The ALP (Concept 5) identifies the acquisition of properties and aviation easements in Santee. Specifically, a 2.2 acre property in the General Industrial Zone, located between Kenney Street and Prospect Avenue, near Cottonwood Avenue is earmarked for acquisition in 2005. Another property at Cuyamaca and Prospect is recommended for acquisition. A 5.8 acre easement is proposed north of Prospect Avenue, just east of Cottonwood Avenue.

The ALP Plan Sheet 2, does not clearly identify these properties by lot or assessor's tax parcel, and the City is unable to ascertain whether all, or a portion of a legal lot or tax parcel is proposed. For instance, the 0.27 acre property targeted for fee acquisition appears to be a 0.54-acre site owned by the Metropolitan Transit Development Board, in the City of Santee (A.P.N. 384-190-44). The ALP should include more precise data on affected properties in Santee."

- ➔ Please note that at the conclusion of the project the County will receive AutoCAD files of the ALP, associated plans and noise contours. We can provide the City with an AutoCAD file containing the proposed runway improvements and runway protection zones. This can then be incorporated with City GIS to analyze affected parcels.

"A 25-foot wide easement is noted on the plan in anticipation of the widening of Prospect Avenue along the airport frontage in the vicinity of Runway 17-35. Please note that a similar easement appears to be necessary on Assessor's Parcel 384-190-72. Additionally, Assessor's Tax Parcel 384-190-44 (8547 Cuyamaca Street) may require an easement that reflects the ultimate improvement of Cuyamaca Street."

- ➔ Please contact Lee Ann Lardy, Supervising Real Property Agent, at 619-956-4824 if and when you are in need of easements.

"The ALP does not appear to take into account the construction of State Route 52 to State Route 67, which is elevated in the northern vicinity of the airport (estimated to be 17 feet per preliminary design drawings). Would this structure cause the modification of the 2025 noise contour map?"

- ➔ Updating of the ALP considered the planned construction of State Route 52. The planned roadway construction will not impact the noise contours.

“Although the airport is mostly in the city of El Cajon, airborne aircraft produce the most significant impacts to the City of Santee in terms of noise. This is clearly depicted on the year 2000 CNEL noise contour map and the year 2025 CNEL noise contour map which affect a larger area in the City of Santee when compared to the City of El Cajon.

The City adopted General Plan 2020 last year. Within the Noise Element the City has established residential use to be “normally acceptable” up to 65 Ldn dB and “conditionally acceptable” up to 70 Ldn dB. Similarly, commercial and office uses are “normally acceptable” up to 70 Ldn dB, while up to 75 Ldn dB uses is “normally acceptable” for industrial uses. As such, any expansion of areas exposed to noise exceeding 65 Ldn dB affects development in the City of Santee.

Currently, the 70 CNEL contour is shown to be fully contained within the airport boundary, but by year 2025, this contour is modified to affect properties between Kenney Street and Prospect Avenue, the industrial park at the corner of Cuyamaca and Prospect Avenue, and a single-family residential area at the southern end of Rhone Road. Nonetheless, industrial and residential uses would remain conditionally acceptable up to 70 CNEL per the City’s General Plan (subject to interior noise attenuation, aviation easements).

Currently, the 65 CNEL contour is shown to generally match the 1984 Gillespie Field CLUP contour, with a small expansion of area between Prospect Avenue and Kenney Street, and a reduction in area west of Cuyamaca Street. However, by year 2025, the 65 CNEL expands to encompass both single- and multiple-family residential neighborhoods west of Rhone/Slope to Northview Court/Prospect Elementary School, and along Forester Creek close to Mission Gorge Road.

The CNEL maps should provide information such that a property affected by noise can be easily identified. The contours are imposed on outdated base maps, and, absent assessor’s tax parcels or street names, an accurate determination of land use impacts is not possible. This is unacceptable to the City of Santee, because such determinations play a role in the processing of land development applications. Specifically, new development and redevelopment of properties are subject to aviation easements and interior noise attenuation per the General Plan – Noise Element Policies 1.10 through 1.12 (listed below).

- The City shall discourage any future expansion of the facilities of Gillespie Field or intensification of operation, other than what has already been planned in the Airport’s Master Plan that would result in greater noise impacts to the City (Policy 1.7).**

- **The City shall encourage the implementation of noise control procedures by Gillespie Field to minimize noise exposure caused by aircraft flyovers within the City)Policy 1.8).**
 - **The City of Santee shall require single-family detached residences located between 65-70 dB CNEL contours for Gillespie Field to ensure that interior noise levels do not exceed 45 dB Ldn (Policy 1.10).**
 - **The City shall require disclosure of airport noise impacts as a condition of all future residential developments in the 65-70 dB noise contours (Policy 1.11).**
 - **The City shall require the recordation of avigation easements for new development proposed within the 65-70 dB noise contours and the Runway Protection and Inner Approach/Departure zones for Gillespie Field (Policy 1.12)."**
- We appreciate your comment and are sensitive to your request. However, please note that the format of the noise contour graphics are appropriate for an ALP Narrative Report. An analysis such as you request is outside the scope of the project, as it is appropriate for an airport noise and compatible land use project such as the CLUP update. Also, please note that the preparation of noise contours was not required as part of the ALP update, however, the County recognized the need considering the age of the CLUP and therefore included this task. The type of data you request can be provided as part of the CLUP update or other analysis. At the conclusion of the project the County will be furnished with AutoCAD files containing the existing and future noise contours. We will be happy to share the noise contour CAD files with you so that the City can incorporate them in the City GIS to facilitate analysis of noise contours on a parcel-level of detail.

"Clearly the landside improvements proposed in the ALP would allow Gillespie Field Airport to remain competitive in the industry. Airside improvements that establish conformance with FAA regulations are necessary for public safety. However, the anticipated intensification of operations would increase areas within the City affected by noise in excess of 65 CNEL, as demonstrated by the future noise contour map. While several of the above-stated policies address the requirements for avigation easements, Policy 1.8 highlights a need to reduce noise levels.

In consideration of Policy 1.8, are airport operations anticipated to occur 24 hours a day? The ALP states that the traffic control tower currently operates between 7 a.m. and 9 p.m. and that 94% of the traffic is between 7 a.m. and 7 p.m. The ALP further discloses that 11.5% of Del Mar Jets' operations occur between 10 p.m. and 7 a.m. (page 4-10)."

- ➔ Please note that the airport currently operates 24 hours per day and the FAA control tower is open between the hours of 7 AM and 9 PM. No changes to these hours of operation have been assumed or are planned.

"Noise control procedures should be implemented by Gillespie Field to minimize noise exposure caused by aircraft flyovers within the City. The fleet mix and frequency should be adjusted for nighttime operations.

Finally, the relationship between the ALP Narrative and the San Diego County Regional Airport Authority Comprehensive Land Use Plan Update for all airports in the County is integral and should also be discussed in the Executive Summary. This is important because the information contained in the ALP Update and Narrative Report is to be considered by the Regional Airport Authority in their Comprehensive CLUP Update. How is it that the Airport Authority's Draft EIR for the Comprehensive CLUP Update is in the public review stage prior to completion of the ALP?"

- ➔ The Airport Authority at its May meeting approved the selection of a consultant to update the CLUP including preparation of an EIR. This particular update is for administrative purposes and to remedy issues at Lindbergh Field. There is another CLUP update that will be more responsive to your needs in the upcoming months, please call Linda Johnson, SDCRAA Airport Planner, at 619-400-2463.

"The City would object to the incorporation of the ALP, which is currently based upon a high growth forecast, into the Regional CLUP Update since the Authority's Airport Land Use Commission (ALUC) would update land use policies in accord with the long term plan for Gillespie Field, represented by the ALP. While not the purview of the ALP, the City continues to emphasize that any land use incompatibility determinations made by the ALUC may be overturned by the City Council of the City of Santee.

A Draft Environmental Impact Report (DEIR) for the San Diego County Regional Airport Authority Comprehensive Land Use Plan Update has been prepared in compliance with the California Environmental Quality Act (CEQA). The public review period for the DEIR closes July 6, 2004. The ALP does not address CEQA

compliance requirements, and its status relative to CEQA should be included in the ALP."

- During the initial phase of the project (FAA grant application and award) the County was advised by the FAA that an environmental analysis was not required for an ALP update. It is the County's understanding that a CEQA document is also not warranted for an ALP update. The ALP update and Narrative Report is a planning document that will lead to a master plan update including the preparation of an appropriate environmental document in accordance with CEQA. The master plan update and environmental analysis will be pursued as a second phase of the planning. If you have comments regarding the CLUP update, please call Linda Johnson, SDCRAA Airport Planner, at 619-400-2463.

"In conclusion, the City of Santee does not approve of an expansion of airport operations or to airport infrastructure that would lead to the expansion of the 65 CNEL over residential areas within Santee. It is irresponsible for the County of San Diego to utilize a High Growth Forecast to plan for future development which would inevitable increase the impacts associated with airport operations on land uses that currently are unaffected. If any such expansion of CNEL occurs over and above the current (Baseline) situation, the City strongly requests that County of San Diego/Gillespie Field provide full mitigation to the newly affected residential properties, to include, but not be limited to mechanical ventilation, multiple-paned windows, and additional wall and ceiling insulation."

- We disagree and believe that use of the high growth forecast is prudent and conservative from the standpoint of facility planning and compatible land use planning. Such an approach was documented in the earliest report (Interim Report) and discussed with the Planning Advisory Committee, on which the City of Santee was represented by Frank Boydston. From a facility-planning standpoint, the use of the high growth forecast would allow the airport to respond to the complete range of possible demand scenarios that were projected (low growth, baseline and high growth). As pointed out in the report there is no commitment to build facilities based on the forecast, but rather, it will be actual demand that dictates the timing of construction of "demand driven" facilities such as hangars. It is not uncommon to use a high growth forecast.

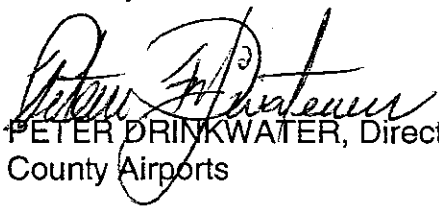
Use of the high growth forecast will also be the most protective in terms of compatible land use planning. If demand does not materialize according to the high growth forecast a buffer is provided by the future (2025) noise contours. This noise buffer protects the City as well as the Airport. Please note that historically aircraft operations at Gillespie Field exceeded 300,000, and while the high growth projection does not reach this level, the future noise contours will provide the greatest

Douglas Williford
Page 7
June 17, 2004

protection if such levels ever again materialize. We believe the noise contours are a practical long-term compatible land use planning tool.

Thank you for your review and input. If you have any questions, please call Sunny Barrett at 619-956-4834.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Drinkwater", is written over the printed name and title.

PETER DRINKWATER, Director
County Airports

PD:SM:jk

cc: John Milligan, FAA; Ted Anasis; file



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June 17, 2004

City of El Cajon
James Griffin, Director of Community Development
200 E. Main Street
El Cajon, CA 92020-3996

Dear Mr. Griffin:

GILLESPIE FIELD – AIRPORT LAYOUT PLAN DRAFT FINAL NARRATIVE REPORT

This letter is written in response to your May 10, 2004 correspondence regarding the ALP Narrative. Issues you have raised are noted below in bold and are followed by Airports response.

"It is disappointing that the role of the City of El Cajon, within whose jurisdiction virtually all of Gillespie Field resides, is not described. In fact, the City of El Cajon does have land use and building permit issuance authority over all of Gillespie Field that is in the El Cajon city limits. The ALP should be modified to reflect the City's role in the further development of Gillespie Field."

→ The text on Page 3-1 will be revised to read that the City of El Cajon has building permit issuance authority for private development of facilities, for those portions of Gillespie Field within the city limits. Private developers will continue to obtain permits from City of El Cajon.

"In addition, it is interesting that the City Council of the City of El Cajon is not afforded the opportunity to take public action on the ALP. Again, Gillespie Field is in the El Cajon city limits."

→ Please note that the City of El Cajon (City) has been a member of the Planning Advisory Committee (PAC) since its inception on November 19, 2001, with Dick Ramos representing the City. There were three meetings of the PAC held on November 19, 2001, April 23, 2002, and September 25, 2002. Meeting notices and materials were

distributed well in advance of the meetings. Furthermore, there were two meetings of the Gillespie Field Development Council held on November 19, 2002 and April 15, 2004.

"It is also hard to understand how the ALP was able to reach this point without any reference to the California Environmental Quality Act (CEQA) or the preparation of an environmental analysis."

"Since the proposed ALP actually shows future buildings and their sizes, the ALP is more than just a set of policies. It is a document used to specify the usage of a property. As such, it should have been considered a "project" under CEQA, in my opinion. The ALP does not mention CEQA or why it's exempt."

→ During the initial phase of the project (FAA grant application and award) the County was advised by the FAA that an environmental analysis was not required for an ALP Update. It is the County's understanding that a CEQA document is also not warranted for an ALP Update. The ALP Update and Narrative Report is a planning document that will lead to a master plan including the preparation of an appropriate environmental document in accordance with CEQA. The master plan and environmental analysis will be pursued as a second phase of the planning program.

"In a related matter, as just mentioned, portions of the ALP are very specific. For example, the map of the ALP (Figure 2-1) shows specific hangar locations and tie-down spaces on the 70-acre Cajon Plaza (Brucker) site. Table 2-3 further describes the action to be accomplished in each of the three development phases of the ALP over the next 20 years including the sizes of building to be constructed and when. The ALP does not indicate what happens if there is a need to modify the size or location of a building or its timing. Must the ALP be formally amended or can this be done administratively?"

→ Please note the discussion that begins at the bottom of Page 6-21. It states that the configuration of future buildings is conceptual and that the ultimate building footprints and orientation may vary. The important point is that the ultimate configuration of buildings should be capable of accommodating the forecast of based aircraft. The configuration of the preferred concept and ALP depicts a strategy that accommodates forecast demand.

"The ALP forecasts future needs based upon a "high growth" forecast even though the number of annual aircraft operations has decreased from 271,000 in 1980 to 187,750 in 2000 (this time period avoids any effects of the post- Sept 11, 2001 flying restrictions). This is a reduction of over 30%. (See Table 3-5) The total

number of aircraft based at Gillespie Field has only slightly increased from 702 to 774 or 10 % during this same time period. (Table 3-4)"

- The forecast acknowledges that demand was not tied to projected socioeconomic growth since there is little relationship between annual changes in based aircraft and changes in population and employment. Rather the forecast was based on the regional trends in based aircraft projected by the FAA Terminal Area Forecast and a scenario where the airport "captures" its historical high market share of the competitive market area.

"Even though the review of the available fixed-based facilities (hangars and tie-downs) indicates a limited number of currently available spaces, the justification for accepting the "high growth" scenario is largely unsubstantiated in my opinion. On page 4-2 there is a statement that "due to a variety of factors mentioned in increase in the CMA" (Gillespie Field Competitive Market Area) but that doesn't justify the "high growth" scenario."

"Since the East County area served by Gillespie Field is essentially built out (the SANDAG 2030 projections show El Cajon, La Mesa, Santee and the surrounding unincorporated areas growing by less than one percent per year over the next 25 years), where are these future pilots and planes going to come from? If there was only a 10 % increase in the number of based aircraft at Gillespie Field from 1980-2000 while the population of the surrounding area increased by 1.1% per year (avg. growth over 20 years from 1980-2000) why would there be a greater increase in aircraft to 2025, with a slower rate of growth in the surrounding areas?"

"The reason for this discussion is that this ALP will result in a major reduction in anticipated jobs, especially with the loss of the Cajon Plaza / Brucker site to only airport-related uses. Using information in Appendix B, the "aviation leaseholds" at Gillespie Field generate 4.2 jobs / acre while the "non-aviation leaseholds" generate 12.9 jobs / acre or a three-fold increase. For the Cajon Plaza 70 acres, this is a difference between 294 potential jobs and 903 potential jobs! (Note: It is understood that the FAA is very unlikely to release these 70 acres to non-aviation uses but the consequences are significant.)"

- The 70-acre parcel is the last remaining area capable of accommodating future aviation uses and as such, was identified for these uses on the ALP. You are correct that the FAA will not approve the release of this parcel for non-aviation uses.

"The format of the ALP is confusing. As previously described, actual hangar sizes and locations as well as tie-down spaces are shown on the 70-acre Cajon Plaza site but no land use at all is shown of the 41-acre site at the northwest

corner of Weld Blvd. and Cuyamaca St. It would be much easier for the City to incorporate the ALP into the City's General Plan if the ALP used colors or words to indicate proposed land use categories rather than the shapes, sizes and locations of specific buildings. For example, the City's General Plan could say "airport-related uses" for the Cajon Plaza site but would not show actual buildings if that's how the ALP is approved."

- The ALP is formatted in compliance with FAA requirements for the preparation of the document. Also please note that at the conclusion of the project the County will receive AutoCAD files of the ALP, associated plans and maps. We can provide the City with an AutoCAD file containing the proposed improvements. This can then be incorporated with City GIS.

"The Airport Airspace Plan (Figure 7-5) is very difficult to understand and the scale is too large to be able to accurately locate a property on the drawing and determine if it would be subject to special height limits. The same is true of the Airport-Protection Zones (Figure 7-6), which do not provide streets or other landmarks for easy reference. The City does not use runway numbers to demarcate restrictions of this nature. This information would be much more useful if placed on a base map of Gillespie Field at a scale clear enough to be understood."

- Notes on the ALP as well as Figures 7-5 and 7-6 indicate that the graphics are reduced versions of large sheet airport plans prepared in accordance with FAA requirements. We can provide you with full size drawings should you wish. Please note that at the conclusion of the project the County will receive AutoCAD files of the ALP, associated plans and noise contours. We can provide the City with an AutoCAD file containing the proposed runway improvements and runway protection zones. This can then be incorporated with City GIS to analyze parcels.

"The noise contour information shown on Figure 15 in Appendix C (Noise Study) is also at a scale that is too large to easily apply to a specific property for the same reasons."

- Figures 7-8 and 7-9 were prepared to enhance the format of noise contour graphics in the technical report (Appendix C). The format of Figures 7-8 and 7-9 are typical presentations for a report such as the ALP Narrative. Please note that at the conclusion of the project the County will receive AutoCAD files of the ALP, associated plans and noise contours. We can provide the City with an AutoCAD file containing the proposed improvements. This can then be incorporated with City GIS to analyze parcels

James Griffin
Page 5
June 17, 2004

"If a property owner or resident needs a determination on noise, crash hazards or building heights, we must be able to locate their property easily. These drawings will only allow a "best guess" in most cases, which is not very reliable or accurate."


- The graphics are not intended to provide assessments of particular parcels and as explained above the AutoCAD files to be provided to the County at the conclusion of the project will provide the detail you request. We will provide you with the electronic files for the noise contours so that the City can conduct analysis on a parcel-level of detail.

"Finally, there is no discussion in the ALP of access or traffic issues. While this would obviously be a part of any environmental analysis of the ALP, the current "breakdown" service level of the on- and off-ramps and bridge at Bradley and Route 67 warrant discussion and mitigation."

- This type of study is not part of an ALP Update or Narrative Report. It will be included in Phase II of this project, the Gillespie Field Master Plan Update.

Thank you for your review and input. If you have any questions, please call Sunny Barrett (619) 956-4834.

Sincerely,



PETER DRINKWATER, Director
County Airports

PD:SM:jk

cc: John Milligan, FAA; file



County of San Diego

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May 13, 2004

John Hammerstrand
Aero Bonanza Aviation
1739 Roble Grande Rd.
Alpine, CA 91901

Dear Mr. Hammerstrand:

RESPONSE TO PUBLIC COMMENT LETTER DATED APRIL 19, 2004 REGARDING THE GILLESPIE FIELD ALP NARRATIVE AND UPDATE

If Gillespie is planned for moderate to heavy transient jet/turboprop aircraft use, owners/tenants occupying residences east and west of runway 27R could easily file a restrictive lawsuit to abate noise and time use of the airport.

- ➔ This statement above is incorrect. County Airports is bound by law to not restrict access to the airport. We have a program at Gillespie Field and all other County Airports to educate Flight Schools, FBO's and the community about our noise abatement procedures. Please call Jeremy Keating at 619-956-4810 for information on Gillespie Field's noise abatement procedures and the role Gillespie Field plays in the National Plan of Integrated Airport System.

The displaced runway threshold of 1,200 ft on runway 27Right must remain as is, in order to keep all aircraft at a higher elevation on approach. Some jet and turboprop aircraft dump fuel to get down to landing weight for the length of runway available. To reduce the displaced threshold to 500 feet +/- will cause residences to complain initially and then a lawsuit. Nobody wants a restrictive airport.

- ➔ The statement above is incorrect. Moving the displaced threshold will not change the approach height for inbound aircraft. Jet and turboprop aircraft landing at Gillespie Field do not 'dump fuel' to land at Gillespie Field. If, in an emergency situation, a jet must land with more than the acceptable landing weight, it will land with fuel on board and be inspected for structural damage.

John Hammerstrand
Page 2
April 30, 2004

Development and expansion of Gillespie Field must be for General Aviation purposes only. Industrial use (now approximately 435+ acres of the 760 acres total) took the Carson Aviation Facility to the west of the Creek and El Cajon Flying Service with my objection to no avail. I'm personally upset that the airport management, Development Council, and Board of Supervisors cater in favor of Corporations with unlimited financial backing and resources to build on Gillespie airport property.

→ Comment noted.

Leasee's with established facilities should be limited in expansion of separate land for further development. The wealth of land for lease should be available for those that do not have leases, but want to lease and build new aviation facilities. It is the intent of County Airports to put all new leases to a public proposal process. Proposals will respond to the same set of pre-established criteria which has yet to be defined.

→ There will be opportunity for public comment regarding the criteria prior to determination.

The nine (9+) acre parcel to the west of Marshall Avenue near the entrance to the control tower and just east of the Forester Flood Control Channel and the San Diego Trolley tracks should be developed by Fixed Base Operators (FBO) and transient aircraft use.

→ Comment noted.

In May 1999 I responded to a Request for Proposal (RFP) to develop the leased land for aviation use with a \$25.00 processing fee. This land was placed in abeyance for some unknown reason to this day. Why the delay? Also, a road signal crossing would have to be erected to stop vehicle traffic when aircraft transition from the main airport taxiway to the FBO parking. NOTE: Marshall Avenue transitions across designated aviation land use that was supposed to go to bid for hangar maintenance + development in the 1970ties.

- The \$25.00 fee you paid was to receive a copy of the RFP materials. These materials were sent to you but you did not submit any proposal to the County. A responsive proposal was submitted and selected to develop the property.
- The developer has been marketing the land for aviation use but has not received any viable proposals for aviation use. Other uses are not being considered at this time. Non-aviation uses will be considered if the current ALP is approved for accessibly reasons you detail above.

John Hammerstrand
Page 2
April 30, 2004

There is no reason to hold the 4.5 acres of vacant land (200-0268A) to the west of Allen Condo-Hangars and south of the airport taxiway. This land should be developed using lease funds with an improvement value around 1.2 million dollars. The County of San Diego should NOT develop this land for transient parking. A leasee could easily enter into an agreement with the County to allow for transient aircraft parking. This land is easily available and in walking distance to the Trolley Station on Weld Avenue. This potential lease could bring in revenue for the County verse the County spending money. One exception: The County may have to construct a bridge across Marshall Avenue from the main airport boundary to the aviation leased land adjacent to the flood control channel for easy pedestrian access to the Weld Trolley Station.

- ➔ It has been determined that it is prudent for County Airports to retain control of a portion of the west side of the airport to accommodate future needs. It is normal and customary for a public transient ramp to be owned and operated by a public agency.
- ➔ This area is burdened by a sewer easement that would make hangar development difficult.
- ➔ Lease funds are not used for private development. Developers must provide their own funding sources.
- ➔ When County Airports develops the area west of Allen Airways, a pedestrian ramp will be considered, to tie into a multi-modal transportation center.


These are my inputs, concerns, and interest in the development and use of Gillespie Field property.

Should there be any questions, please feel free to contact me at 619-445-4882.

John Hammerstrand

If you have further questions, please contact Gillespie Field Airport Manager, Noreen Crane, at 619-956-4805.

Sincerely,



PETER DRINKWATER
Airports Director

cc: file; web page; FAA; P&D Aviation



County of San Diego

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June 22, 2004

Gillespie Airports Lessees Association
Dick McDowell, President
Wayne Breise, Secretary
1905 N. Marshall Ave.
El Cajon, CA 92020

Dear Mr. McDowell and Mr. Breise:

This letter is written in response to your May 10, 2004 correspondence regarding the ALP Narrative. Issues you have raised are noted below in bold and are followed by Airports response.

"Thank you for meeting with our organization. We believe significant progress was made and that all present now share a better understanding of most issues. Here are some of our thoughts and remaining questions. We would like to continue reserving our right to submit our final thoughts prior to May 21."

It was encouraging to hear that we can add a comment #12 to the ALP that states that building beyond the "Control Tower Clear Line of Sight line" will be allowed providing that the building does not interfere with the line of sight between the Control Tower and the runway / taxiway system. We look forward to reviewing the language for this comment."

→ A comment # 12 has been disapproved by the FAA to add to the ALP. County Airports had submitted the proposed language to the FAA for review and approval. At this point in time, building beyond the 'Control Tower Clear Line of Sight line' or the 'Building Restriction Line' is still not allowed.

"The proposed comment #12 on the ALP will reduce the amount of lost building area on the San Diego Aircraft leasehold from about 5 acres to about 2 ½ acres (see attached diagram) and will eliminate the problem related to La Jolla Investments, Safari West, & El Cajon Flying Service. The remaining 2 ½ acres at

Mr. McDowell and Mr. Breise

Page 2

June 22, 2004

San Diego Aircraft is contained in the "Runway Visibility Zone" (The area shown in yellow on the proposed ALP). Aircraft tie downs will be allowed in this area, however we are told that no buildings will be allowed."

→ All of the area you refer to is within the Building Restriction Line (BRL). At this point in time, there will be no further buildings allowed to be constructed within the BRL.

"If 2 ½ acres of the San Diego Aircraft leasehold has lost the opportunity for future development, how can this be mitigated?"

→ The area you are referring to may still be used for the purpose it is being used for currently (tiedowns).

"It appears that the "runway visibility points" on runway 17/35 and 27L that were used to create the Runway Visibility Zone are incorrect. Are these points correctly identified on the proposed ALP? See AC150/5300 503 b (2) & (3)"

→ The points you refer to have been located on the taxiway to avoid a 'line of sight' or 'non-movement area' problem on the taxiway as well as the runway.

"Can the BRL west of 17/35 be maintained at 250 ft rather than increased to 300 ft without changing the B-11 design of this runway? Taxiway B meets B-11 standards, we believe that a B-11 runway only requires one taxiway, so an exception/deviation for taxiway A sounds reasonable. This would allow additional capital improvements and would prevent the eventual removal of existing buildings."

→ No. FAA has been consulted on this issue and prefers that the design standards be adhered to.

→ Due to safety reasons, County Airports does not wish to make exceptions or deviations to FAA standards. Taxiway 'A' has been built with Federal funds, grant assurances require us to keep the taxiway in place.

"It was encouraging to hear that the County would be receptive to a reasonable proposal from Golden State that would allow them to continue in their present location providing that they give up a portion of their ramp to comply with the ALP."

→ The Golden State lease expires 2/28/2007. County Airports will work constructively with Golden State Aviation to allow them to remain viable until that time and will consider other options for the future.

Mr. McDowell and Mr. Breise

Page 3

June 22, 2004

"It was also encouraging to hear that the County intends to offer future parcels in an open process to all qualified developers and to maintain established leasehold development standards, such as 5 acre minimum size parcels and \$5,000 per acre per year minimum capital improvements. This would maintain the level of playing field and will allow the successful bidder to determine the details of the aviation development. We believe that the marketplace is best qualified to determine the highest and best aviation use for each parcel."

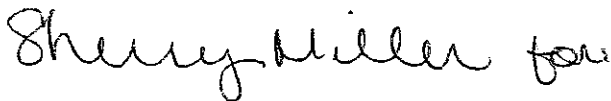
- ➔ It is the intent of County Airports to put all new leases to a public proposal process. Proposals will respond to a set of pre-established criteria which has yet to be defined, although it is likely that it will be consistent with currently established criteria such as 5 acre parcels and \$5,000 per acre per year of term. There will be opportunity for public comment regarding the criteria prior to determination. However, the County continues to reserve the right to alter the size and shape of parcels to best meet the needs of the airport, users and lessees.

"In an effort to resolve these final issues we would propose an additional meeting at the earliest possible date."

- ➔ A meeting was held on Monday May 17, 2004. GALA presented options and a written response was sent.

If you have any further questions please contact Principal Airport Manager, Sherry Miller at (619) 956-4800.

Sincerely,

A handwritten signature in cursive script that reads "Sherry Miller for".

Peter Drinkwater
Director of Airports

PD:jk



County of San Diego

DEPARTMENT OF PUBLIC WORKS

JOHN L. SNYDER
DIRECTOR

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June 23, 2004

Gillespie Pilots Association
Phyllis Trombi, President
P.O. Box 712881
Santee, CA 92072

Dear Ms Trombi:

This letter is written in response to your May 8, 2004 correspondence regarding the ALP Narrative. Issues you have raised are noted below in bold and are followed by Airports response.

"The Air Traffic Control Tower would be best placed on the north side of the field, allowing better sighting of aircraft operations. It should be moved in Phase I, and as such will signal the beginning of compliance with FAA airport standards."

- This project is estimated at 4.5 million dollars. The FAA has advised Airports that building a new ATCT facility would not be grant eligible at this time.

"Property to be purchased at the south end of Runway 17/35 should be accomplished in Phase I. A perimeter road constructed subsequent to the land acquisition will ensure no loss of runway length."

- The proposed ALP identifies the property south of R17/35 to be acquired in Phase 1 of the implementation plan. The acquisition and easements still need approval and budgeting through the normal process.

"We support the non-aviation use of the divorced property west of Marshall Avenue. A parcel of one acre or larger needs to be set aside for the 'Bob Dennis Memorial Park.'"

- Comment noted.

"The present Terminal Building is appropriately located and need not be moved. Instead, we suggest a remodel and possible addition of a second story restaurant. The transient ramp, never full, is also appropriately located there."

Phyllis Trombi
Page 2
June 23, 2004

→ Comment noted.

"An Administration Building for DPW, if needed, could be build on the non-aviation property on Marshall Avenue, rather than the 70 acre parcel known as the 'Brucker Lease.'"

→ Comment noted.

"The proposed light helicopter area near the junction of the two runways is deemed to be a distraction to other aircraft operations and a safety hazard. All future helicopter areas should be moved to the south end of the airport subsequent to the above mentioned land acquisition."

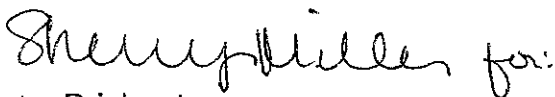
→ Comment noted.

"The proposed additional transient ramp at the west end of the airport should be only temporary use of that acreage. Consideration should be given to future land development incorporating the use of the adjacent trolley, enabling airport access by the larger general community. Positive community relations will be enhanced if members of the public traveled by trolley to visit a museum or other such public benefit activity located there."

→ It has been determined that it is prudent for County Airports to retain control of a portion of the west side of the airport to accommodate future needs. It is normal and customary for a public transient ramp to be owned and operated by a public agency. This area is burdened by a sewer easement that would make most types of development difficult. When County Airports develops the area west of Allen Airways, a pedestrian ramp will be considered, to tie into a multi-modal transportation center.

If you if have any further questions please contact Principal Airport Manager, Sherry Miller at (619) 956-4800.

Sincerely,

A handwritten signature in cursive script that reads "Sherry Miller for:".

Peter Drinkwater
Director of Airports

PD:jk



County of San Diego

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April 28, 2004

Gillespie Airport Lessee's Association
1905 North Marshall Avenue
El Cajon, CA 92020

Dear GALA Members:

In response to your letter dated April 15, 2004 the following is provided:

Presenting a plan to GALA on April 6 and planning for final approval in June does not allow adequate time for review.

- ➔ GALA has been an integral part of the ALP Narrative Update process since the formation and first meeting of the Planning Advisory Committee (PAC) on November 19, 2001.

The proposed ALP increased the BRL from 250 ft to 300 ft west of 17/35 – Why? Does this mean a reduction in usable aviation land? Will this change cause the elimination of existing aircraft tiedown spaces?

- ➔ The new BRL is based on AC 5300-13 Chg 7 and incorporates the Runway Visibility Zone, Air Traffic Control Tower Clear Line of Sight, Runway Protection Zone, Runway Obstacle Free Area, Navigational Aid Critical Areas and Area for Terminal Instrument Procedures. The new BRL complies with the current Advisory Circular.
- ➔ No, this area is still usable.
- ➔ No, tiedowns are acceptable within some areas of the BRL.

What criteria was used to determine the need for B-II standards on these taxiways? If taxiway B currently meets B-II clearance standards, why alter taxiway A?

- ➔ Runway 17/35 is a B-II runway; parallel taxiways must complement that standard.

- The category of runway determines the safety standard and use of parallel taxiways, not the number of operations.

The Runway Visibility Zone/Control Tower Clear Line of Sight line further restricts the BRL. Does this constitute a "taking of rights?" Under the terms of existing Master leases, does the County have a legal right to do this?

- No, your lease document requires compliance with all Federal, State and Local Rules and Regulations. At this time all current uses are still allowed.
- Yes, your lease document states the following: **"2.4 Lease Subordinate to Conditions and Restrictions Imposed by Public Agencies on Airport Operations. This Lease shall be subordinate and subject to the terms, conditions, restrictions and other provisions of any existing or future permit, lease and agreement between County and any federal, State or local agency governing County's control, operation or maintenance of the Airport, or affecting the expenditure of federal funds for the Airport. Lessee shall be bound by all such terms and conditions, and shall, whenever County may so demand, execute, acknowledge or consent to any instrument evidencing such terms, conditions, restrictions or provisions. Without limiting the generality of the foregoing, this Lease and Lessee's occupancy of the Premises are expressly made subordinate and subject to the terms, conditions, restrictions and other provisions of those requirements of the Federal Aviation Administration specifically set forth in Exhibit "B" (FAA REQUIREMENTS) and Lessee shall be bound by all such requirements."**

The Control Tower Clear Line of Sight line appears to ignore building height considerations. What is the definition of the CTCLS? Why does it ignore height?

- Refer to AC 5300-13 chg 7 - pages 10, 56, 57, 65 (or see www.faa.gov)
- The new BRL is based on AC 5300-13 Chg 7 and incorporates the Runway Visibility Zone, Air Traffic Control Tower Clear Line of Sight, Runway Protection Zone, Runway Obstacle Free Area, NAVAID Critical Areas and Area for Terminal Instrument Procedures. The new BRL complies with the current Advisory Circular. Height is addressed in most areas listed above.

Does the establishment of this Clear Line of Sight improve aviation safety? Does established data justify the establishment of this line?

- Yes
- Yes

The ALP concludes that additional hangars are needed, and then prevents existing Master Leaseholders from building hangars by moving the BRL.

- ➔ Yes, additional hangars are needed. All leaseholds were studied and five development concepts were identified in Chapter 6 of the ALP Narrative Update. Because of the new Standards set forth in AC 5300-13, some lessees will not be able to add large hangars toward the taxiways and runways.

A new tower site could reduce or eliminate the BRL problem. Can the new tower be moved to Phase I construction?

- ➔ FAA Order 5100.38B, Change 1, Sec. 610 states: 'Relocation of ATCT's solely to correct existing line-of-site problems would not be eligible'. (not eligible for FAA AIP funding)
- ➔ County Airports does not foresee having the needed funding for relocating the ATCT at this time.

Existing Master Leaseholders depend on new construction and capital improvements to extend or renew their lease. Removing the ability to build by moving the BRL will prevent new capital improvements and may prevent lease renewals.

- ➔ County Airports is bound by Federal Regulation and Grant Assurances to adhere to current FAA standards, including those identified in AC 150/5300-13.

There are two types of FBO's on Gillespie. Those that are passive and those that provide major service to the aviation public. Golden State has fit in the second category for over 30 years. This plan destroys their leasehold. Is this justified? If so, how can this action be mitigated?

- ➔ The proposed ALP does not 'destroy the leasehold that Golden State occupies.
- ➔ County Airports is bound by Federal Regulation and Grant Assurances to adhere to current FAA standards, including those identified in AC 150/5300-13. Most likely, Golden State will need to relocate approximately 14 tiedown spaces that are within the ROFA, within 30 days of the approval of the new ALP. Their building encroaches into the proposed BRL and at this time, the County does not intend to demand that they move the building. The issue can be addressed further, at their convenience.

Gillespie currently has more hangars (500) than any General Aviation airport in the world known to GALA members. Does adding 400 additional hangars make sense? T-

GALA Members

Page 4

April 28, 2004

Hangar construction produces few jobs, little activity, limited fuel sales, and minimum revenue. Is this really the highest and best aviation use for the majority of the new 70-acre parcel?

- The ALP addresses Aviation Demand Forecast in Chapter 4. The forecast for based aircraft is expected to increase as demand in the region increases.

All aviation parcels should be developed with the same criteria that has existed by several decades. Criteria such as 5-acre minimum size parcels, \$5,000 per acre per year capital improvement requirements, etc. Preferential treatment for any special interest group would be a misuse of public funds and would destroy the existing level playing field.

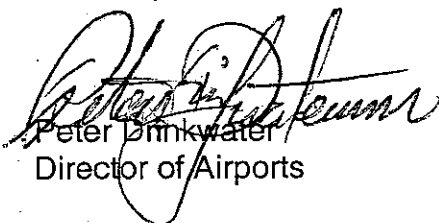
- County Airports will develop Gillespie Field with guidance and assistance from the Gillespie Field Development Counsel in accordance with FAA Rules and Regulations in a manner that benefits the aviation public and users.

The Federal Aviation Agency, the County of San Diego and GALA all share the same basic objective: To develop Gillespie Field in a manner that best serves the aviation public. In general, GALA believes that high standards, uniformly enforced throughout the Southern California airport system, are the correct road toward this objective. Our final concern is that the FAA is engaging in selective enforcement by attempting to hold Gillespie Field to a standard that they are unable or unwilling to enforce on all Southern California airports.

- This issue/question is best addressed by the Federal Aviation Administration.

If you if have any further questions please contact Airport Manager, Noreen Crane at (619) 956-4805.

Sincerely,



Peter Linkwater
Director of Airports

PD:jk



County of San Diego

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June 23, 2004

San Diego Aircraft
Wayne Breise
1987 N. Marshall Ave.
El Cajon, CA 92020

Dear Mr. Breise:

This letter is written in response to your June 4, 2004 correspondence regarding the ALP Narrative. Issues you have raised are noted below in bold and are followed by Airports response.

"At the GFDC meeting, I was disappointed in your failure to support or address any of the concerns brought forward by my company. Your unwillingness to even speak in support of comment 12 on the ALP was particularly distressing. It appears that you and your staff still do not have a clear understanding of critical questions, yet you are determined to move forward at a great cost to my company."

→ A comment #12 on the ALP was addressed and it was noted that a letter was sent to the FAA requesting addition of that comment. Since that time, we have received a reply from the FAA disapproving the addition of that comment.

"Will comment 12 be added to the ALP? If not, does FAA policy consider structure height related to new construction in the area between the Control Tower Line of Sight line and any other restrictive line?"

→ No, a comment #12 will not be added to the ALP.
→ No, no buildings can be erected inside of the Building Restriction Line.

"The runway visibility point on the west portion of runway 27L is 2 & 1/8 inches from the intersection of the centerline of runway 17 and runway 27L. At a scale of 400 ft per inch, this measures 850 feet on the ALP. AC150/5300 clearly states that

Wayne Breise
Page 2
June 23, 2004

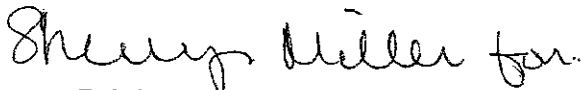
the proper point should be 750 feet. Will this mistake be corrected? The answer that you provided to this question in you May 25, 2004 letter demonstrates that you did not understand the question."

→ The points you refer to have been located on the taxiway to avoid a 'line of sight' or 'non-movement area' problem on the taxiway as well as the runway.

"If you or your staff needs further explanations related to these two questions, feel free to call. If not, please demonstrate that you understand the questions and then supply a specific answer to each."

If you if have any further questions please contact Principal Airport Manager, Sherry Miller at (619) 956-4800.

Sincerely,

A handwritten signature in cursive script that reads "Sherry Miller for".

Peter Drinkwater
Director of Airports

PD:jlk



County of San Diego

DEPARTMENT OF PUBLIC WORKS

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May 6, 2004

Certified Mail
Return Receipt Requested
7001 0360 0001 8145 4125

Margie Drilling
Federal Aviation Administration
Western-Pacific Region
Airports Division, AWP-621.3
15000 Aviation Boulevard, Room 3024
Lawndale, CA 90261

Dear Ms. Drilling:

GILLESPIE FIELD AIRPORT LAYOUT PLAN

With respect to the draft Airport Layout Plan submitted to you for review on April 7, 2004, you are aware of the concern expressed by some fixed base operators about the building restriction line depicted on the plan. Their concern is specifically related to the portion of the BRL dictated by the control tower line-of-sight criteria (i.e., the diagonal portion of the BRL in the southwest quadrant of the airfield formed by the intersecting runways). The County has identified an approach to address concerns of the operators in the form of an additional note on the ALP and we are requesting your consideration of this revision to the ALP.

The proposed note is as follows:

"12. Future structures may be permitted within the diagonal portion of the BRL southwest of the runway intersections provided that control tower line-of-site of the movement area is not obstructed, and all other criteria contained in FAA AC 150/5300-13, Paragraph 210 is met, and an airspace determination of "No hazard" is obtained from FAA. "


This is proposed to accommodate possible construction of hangars in situations where the proposed construction would not obstruct the view of the movement area and where all other BRL criteria is met. For example, a T-hangar building near the base of the control tower would be within the BRL but would not obstruct line-of-site. The intent is

Margie Drilling
Page 2
May 6, 2004

to provide a mechanism for a case-by-case review of proposed construction in this area of the airport. As part of the review the building proponents would need to demonstrate to the satisfaction of the County and FAA that line-of-sight is not compromised.

In your review of the draft ALP would you also kindly advise on this proposed revision.
Thank you.

Sincerely,



PETER DRINKWATER
Director of Airports

PD:jk